



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Dron

REPLY TO THE ATTENTION OF.

EPA Region 5 Records Ctr.



362911

May 3, 2002

Roy Ball
Environ Corp.
740 Waukegan Road
Suite 401
Deerfield, IL 60015

Dear Roy:

Enclosed you will find Agency comments on the Eagle Zinc RI/FS workplan that were discussed at our April 17 review meeting at your offices. Please incorporate these comments into the workplan in the areas designated.

1. Page 1 Section A. Why was the workplan organized in this manner? As discussed, it should be organized to be consistent with the SOW with separate appendices for the QAPP and the HSP.
2. Page 15 last par. This paragraph should be revised to remove the references to State standards, to be consistent with the Agency comment on the PSE report. An official request for ARARs will occur later in the RI/FS.
3. Page 19 par 3. Please include a statement that when the piles are inspected and sampled, evidence for any off-site migration of pile soils will be properly investigated. This has not been an objective of past site inspections.
4. Page 24 par 1. Please include the language from the SOW, page 8, which states that actual sampling numbers may increase as necessary if the initial sampling approach proves inadequate. The other items from the SOW, including site mapping, site legal description, access

information, support facilities should also be included here. You indicated that existing site buildings would be used for on-site support-this should be included here with phone and other utility information.

5. Page 30 Section b. The text describing the comparison to TACO was removed from the PSE text and should also be removed here.
6. Page 34 Section b. There should be 16 sediment samples to be consistent with the SOW. We agreed that the location should be between sample locations 11 and 12.
7. Page 40. The SOW called for a discussion of possible bench scale testing to evaluate treatment alternatives. This should be included here.
8. Page 43 Section III. Where is the data management plan contemplated in the SOW?
9. Page 45 par 2. Please include a statement that says if organics are identified as an issue, then supplemental sampling may be necessary for further characterization. Please provide the further clarification for the last portion of the paragraph that you provided at the April 17 meeting.
10. Page 46 par 1. Please add language stating that the duplicates will be collected from samples that show high readings.
11. Page 46 par 2. Should read 16 samples and revise the language to reflect what is stated in the SOW.
12. Page 47 top par. Sampling increments should include samples from the center of the piles-f the sampling equipment cannot reach the center, alternate sampling methods should be utilized.
13. Page 47 last par. What are the depths of the samples? Are they to the bottom of the stream channel? How deep is the stream channel? Will they be grab samples?
14. Page 48 par 2. Results from MW-a through MW-E should be included in the summary of data collected at the site. The temporary wells should be sampled and analyzed for the full contaminant list to determine if other contaminants of concern are present at these locations. These results can be used to help determine final monitoring well locations.
15. Page 52 last par. What is the criteria for the four foot depth selection? Please include in the text here.
16. Page 53 Section 2. Please include information in the text to highlight the intermittent nature of flow in the sediment drainageways. What is the depth of each sediment sample? Please also include information regarding sampling methods for dry and wet sampling. EPA is concerned about reproducibility of sampling locations by utilizing only the flags mentioned in the text.

Some type of geolocator should be used so that locations can be reproduced at a later date, if necessary.

17. Page 54 par 1. EPA prefers that any particle size reduction be done in the lab.

18. Page 55 par 2. Well development should be based on the stabilization of well purging parameters listed here, not just based on specific well volumes removed. This is not only true for sampling but also for well development.

19. Page 58 1st incomplete par. Where will the drums be stored on-site until disposal? How long will it take to dispose of drums-will the PRPs wait for a specific number of drums or dispose as each drum is filled?

20. Page 58 last par. PPE should be drummed and disposed of as special waste. Please modify this section to include what is listed in the SOW on page 12 and 13, Tasks 4 and 5 with respect to report preparation and other details listed there.

21. Page 59, Section IV. QAPP comments will be sent shortly from Region 5 QAS staff. Was current EPA Region 5 QAPP guidance utilized to prepare this QAPP?

22. Page 60 2nd bullet. IEPA will not be approving the site QAPP.

23. Page 101 Section V. Guidance referenced in the SOW should be highlighted here.

24. Page 131 Section O. There should be a dedicated phone line for use during field work as well as a site location where records and meetings can be held. There should be a map to the hospital included here.

25. Page 133 par 1. Please include the language from the SOW regarding applicable risk assessment guidance and include any updates here.

26. Page 133 1st three bullets. Another potential exposure scenario would be for an on-site trespasser or future residential, as portions of the site may be redeveloped as a reasonably anticipated land use in the future.

27. Page 135 subpar i. The off-site soil pathway has not been entirely precluded from risk management discussions and is predicated on results of on-site soil and residual waste pile sampling during the RI.

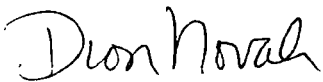
28. Page 143 Section VII.. Formatting of this section is inconsistent with the SOW-please correct.

29. Page 143 par 2. All potential remedies listed in the presumptive remedy guidance referenced here should be included in this paragraph. The proper time to discuss the PR guidance is at the RI report meeting, where the PRPs may propose using only the PR guidance for the FS development. EPA can then decide if the proposal has merit.

30. Attachment 1, Figure I-1. TL Diamond owner information should be included here, similar to what was done for the PSE report.

As mentioned above, specific QAPP comments will be sent shortly, most likely by May 10. Please revise this document in accordance with the schedule contained in the SOW. If there are any questions regarding this letter, please contact me.

Sincerely yours,

A handwritten signature in black ink that reads "Dion Novak". The signature is written in a cursive, slightly slanted style.

Dion Novak
Remedial Project Manager

cc: R. Lanham, IEPA
T. Krueger, EPA
B. Sypniewski, EPA